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14 Attorneys for Defendants,
JOHN EARL REDFERN, J. REDFERN, INC.,
15 dba GOLDEN STATE LANDSCAPING; JLS
PARTNERS, INC., dba GSL CONSTRUCTION,
16 EMPIRE LANDSCAPE CONSTRUCTION

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA

19 SAN FRANCISCO DIVISION

20 MARCOS VARGAS, ROMUALDO
21 ALTAMIRANO, PEDRO RAMOS,
BULMARO BAZAN, MARCOS
22 MANDUJANO, JOSE: SOLIS, LUIS
PENA, BENITO CHAIREZ, FIGUEROA,
23 FREDY ROCHA, SALVADOR FLORES,
ISMAEL CORONA, EPIGMENIO
24 LOPEZ, JUAN CORONA, ENRIQUE
TAMAYO, FRANCISCO SALGADO,
25 SILVERIO TORRES, MARTIN RAMOS
RAMIREZ, ANGEL SANCHEZ, ERON
26 LOPEZ, EDUARDO VARGAS, JORGE
SOTO, RIGOBERTO SANCHEZ:, JULIO
27 LOPEZ, JOSE J. GARCIA, PEDRO
SIERRA, DAMACIO SANCHEZ, JUAN
28 GUERRA, JAIME MARTINEZ JR.,

Case No. C-12-04052-CRB

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER REGARDING RESPONSIVE
PLEADING TO THE COMPLAINT
PURSUANT TO LOCAL RULE 6-1 AND
TO CONTINUE CASE MANAGEMENT
CONFERENCE PURSUANT TO LOCAL
RULE 6-2**

JOINT STIP. AND [PROPOSED] ORDER
REGARDING RESPONSE TO COMPLAINT
AND TO CONTINUE CMC

1 ROBERT MONTOYA, MATEO
 2 GUZMAN, LAZARO MAYA, JOSE
 3 ESTRADA, ANICETO ALMANZA
 4 SANCHEZ, EMILIO VARGAS, JOSE
 5 ANTONIO ALVAREZ, ANTONIO
 6 RODRIGUEZ, JOSEPH RENEE
 7 RODRIGUEZ, MAURICIO SANCHEZ,
 8 MAURICIO SANCHEZ ARZATE,
 9 MANUEL RENTERIA, MIGUEL
 10 SUCHIL MENDOZA, and VICENTE
 11 MARTINEZ, individually and on behalf of
 12 all others similarly situated,

13
 14 Plaintiffs,

15 v.

16 JOHN EARL REDFERN, an individual;
 17 J. REDFERN, INC., (dba "GOLDEN
 18 STATE LANDSCAPING"), a California
 19 Corporation; JLS PARTNERS, INC.,
 20 (dba "GSL CONSTRUCTION"), a
 21 California Corporation; and EMPIRE
 22 LANDSCAPE CONSTRUCTION, a
 23 California Corporation,

24 Defendants.

25 Plaintiffs Marcos Vargas, Romualdo Altamirano, Pedro Ramos, Bulmaro Bazan, Marcos
 26 Mandujano, Jose Solis, Luis Pena, Benito Chairez, Figueroa, Fredy Rocha, Salvador Flores, Ismael
 27 Corona, Epigmenio Lopez, Juan Corona, Enrique Tamayo, Francisco Salgado, Silverio Torres,
 28 Martin Ramos Ramirez, Angel Sanchez, Eron Lopez, Eduardo Vargas, Jorge Soto, Rigoberto
 Sanchez, Julio Lopez, Jose J. Garcia, Pedro Sierra, Damacio Sanchez, Juan Guerra, Jaime Martinez
 Jr., Robert Montoya, Mateo Guzman, Lazaro Maya, Jose Estrada, Aniceto Almanza Sanchez, Emilio
 Vargas, Jose Antonio Alvarez, Antonio Rodriguez, Joseph Renee Rodriguez, Mauricio Sanchez,
 Mauricio Sanchez Arzate, Manuel Renteria, Miguel Suchil Mendoza, and Vicente Martinez,
 (collectively "Plaintiffs") and Defendants John Earl Redfern, J. Redfern, Inc. (dba Golden State
 Landscaping), JLS Partners, Inc. (dba GSL Construction), and Empire Landscape Construction
 (collectively "Defendants") agree and stipulate, through their respective counsel, to the following
 extension and continuance:

1 1. The parties are currently discussing settlement, and thus, they would like to direct
2 their resources and time to such negotiations.

3 2. The parties have agreed that Defendants' responsive pleading to Plaintiffs' complaint
4 will be filed on or before January 11, 2013;

5 3. The parties request a continuance of the Case Management Conference, which is
6 currently set for December 13, 2012, by approximately 60 days or to a later date and time that is
7 convenient for the Court.

8 THEREFORE, the parties hereby stipulate and request that this Court order the following:

9 1. The deadline for Defendants to file their responsive pleading to Plaintiffs' complaint
10 is set for January 11, 2013.

11 2. The Case Management Conference current schedule for December 13, 2012, be
12 continued to February ¹⁵ ~~14~~, 2013, or to a date that is convenient for the Court.

Dated: November 13, 2012

/s/ Marco A. Palau

MARCO A. PALAU
LAW OFFICES OF MALLISON &
MARTINEZ
Attorneys for Plaintiffs
MARCOS VARGAS, ROMUALDO
ALTAMIRANO, PEDRO RAMOS,
BULMARO BAZAN, MARCOS
MANDUJANO, JOSE: SOLIS, LUIS PENA,
BENITO CHAIREZ, FIGUEROA, FREDY
ROCHA, SALVADOR FLORES, ISMAEL
CORONA, EPIGMENIO LOPEZ, JUAN
CORONA, ENRIQUE TAMAYO,
FRANCISCO SALGADO, SILVERIO
TORRES, MARTIN RAMOS RAMIREZ,
ANGEL SANCHEZ, ERON LOPEZ,
EDUARDO VARGAS, JORGE SOTO,
RIGOBERTO SANCHEZ:, JULIO LOPEZ,
JOSE J. GARCIA, PEDRO SIERRA,
DAMACIO SANCHEZ, JUAN GUERRA,
JAIME MARTINEZ JR., ROBERT
MONTTOYA, MATEO GUZMAN, LAZARO
MAYA, JOSE ESTRADA, ANICETO
ALMANZA SANCHEZ, EMILIO VARGAS,
JOSE ANTONIO ALVAREZ, ANTONIO
RODRIGUEZ, JOSEPH RENEE
RODRIGUEZ, MAURICIO SANCHEZ,
MAURICIO SANCHEZ ARZATE, MANUEL
RENTERIA, MIGUEL SUCHIL MENDOZA,
and VICENTE MARTINEZ

Dated: November 13, 2012

/s/ Gina M. Chang

GINA M. CHANG
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A Professional Corporation
Attorneys for Defendants
JOHN EARL REDFERN, J. REDFERN, INC.,
dba GOLDEN STATE LANDSCAPING; JLS
PARTNERS, INC., dba GSL
CONSTRUCTION, EMPIRE LANDSCAPE
CONSTRUCTION

1 IT IS SO ORDERED:

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4 Dated: November 15, 2012

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